

Smoking and Tobacco Use

The purpose of this policy is to improve the health of Graphic Packaging salaried and non-union hourly employees by promoting cessation of tobacco products.

Policy:

All non-union properties owned or leased by Graphic Packaging International, or its subsidiaries, are to be tobacco free, which means that the use of tobacco products including, but not limited to cigarettes; cigars; pipes; electronic cigarettes (“e-cigarettes”) or any other personal vaporizing devices; and chewing, dissolvable and smokeless tobacco, is strictly prohibited. Even if the leased building where employees reside is not tobacco free and allows other tenants to use smoke and tobacco products, all GPI employees are expected to comply with this policy while on the property. Additionally, all salaried and non-union employees who reside on GPI campuses that are not designated as tobacco free are expected to comply with this policy. All tobacco products should be stored in the individual’s locker, purse or vehicle and they should not be visible at any time. Where applicable, this policy covers all internal and external areas; parking areas - including private vehicles while they are on GPI property; all entrances and exits; and all company-owned, rented and/or leased vehicles.

Other GPI locations will move toward tobacco-free campuses wherever possible. Employees should consult their local smoking and tobacco use policies for further guidance.

In instances where the law dictates, those affected locations shall comply with all regulations as it relates to smoking and the use of tobacco.

Responsibilities of all employees, contractors, interns, visitors, and others with regard to compliance with the tobacco-free policy at GPI

Adherence to the policy cited above is the responsibility of all GPI salaried and non-union employees, and failure to comply with this policy will result in discipline, up to and including termination. Contractors, interns, and visitors are also prohibited from using tobacco products while on GPI property, whether the property is leased or owned, and may be asked to leave the premises if they violate this policy.

Responsibilities of managers and supervisors with regard to compliance with the tobacco-free policy at GPI

This policy will be enforced through administrative action by managers and supervisors. In general, managers and supervisors are responsible for ensuring that employees under their direction are aware of the policy and comply with it and for taking appropriate action to correct noncompliance.

Any manager or supervisor who observes violations of the policy should report these violations to the supervisor of the employee in question. Once the employee’s supervisor has been notified of a violation, or if the supervisor directly observes a violation by an employee under their direction, the supervisor is responsible for discussing the violation with the employee and taking appropriate disciplinary action. The Company will not retaliate against employees who report violations of this policy. Managers should consult with a Human Resources representative for advice on the appropriate discipline.

Employees who engage in lawful activities, including smoking, when they are not working, will not be disciplined pursuant to this policy. This does not affect the application of the Company’s Drug and Alcohol policy.